

Brian Sponsler
20561 Highline Road
Tehachapi, California 93561

Sarah Mongano
California State Lands Commission
100 Howe Avenue Suite 100-South
Sacramento, California 95825

Dear Ms Mongano:

I have reviewed the El Paso Line 1903 Pipeline Conversion Project, Draft Environmental Impact Report / Environmental Assessment, (BLM CACA 42649) and have the following Observations and Proposed Mitigations.

Observation 1

- G-1
- o The distance between proposed valves 19 & 20 is 18.10 miles (milepost 32.36 and milepost 50.46 respectively. (Table 2-3, Project Activities, Location, and Disturbance Areas) This mileage includes both Hazard Class II area and Hazard Class III (MP 43 to MP 44, Figure 4.6.-1.) This unblocked interval contradicts the spacing intervals required by 49 CFR 192.179 (2) and 49 CFR 192.179 (3) which requires that "each point" within a Class II and Class III location be no more than 7 1/2 and 4 miles respectively of a sectionalizing block valve.

Proposed Mitigation 1

- G-1
- o Add isolation valves as necessary to reduce the blocking interval in these areas as required by their Hazard Class.

Observation 2

- G-2
- o A substantial proportion of the population of the Tehachapi area (and a State Prison) is located west of Milepost 35, in unincorporated areas with very few commercial services. The only access to and from this area is by either State Highway 202 (Valley Boulevard) or Highline Road, which close to within a few hundred feet from each other at about milepost 34. A pipeline rupture in this area would close both roads, isolating approximately 20,000 people from medical care, employment, and other necessary services. This is clearly shown in Appendix A, map 2.

3.7. Sponsler

Response:

G-1 This concern was addressed by adding an automatic valve at MP 37, see page 4-163 of Section 4.6.1 of the Draft EIR/EA.

G-2 Comment noted, automatic shutdown valves were added in this area to enhance public safety, see page 4-163 of Section 4.6.1 of the Draft EIR/EA.

- **Proposed Mitigation 2**

- Engineer and implement additional mitigation measures specific to protect passage by either Highline Road or Valley Boulevard in the event of a rupture in the critical pipeline section.

- **Observation 3**

- G-3
- Steps to close pipeline valves are described on page 4-175, Section 4.6.4, Impact Analysis and Mitigation. The entire paragraph is confusing with mutually exclusive and irrelevant time sequences given. For example, only timing for automated valves is given, although it is acknowledged that the existence of radio-controlled Main Line Valves (MLV) is limited within the EPNG system. This description concludes with the statement that "total time from first close command to MLV closure can be as little as 3 to 4 minutes." This statement only describes a best case scenario and is of limited value to evaluate possible impacts or mitigation needs.

- **Proposed Mitigation / Clarification 3**

- G-3
- Provide an average and standard deviation analysis of the time required for notification-to-closure based on industry-wide and EPNG statistics, and provide a basis for reviewers to determine the affect of valve-open time on event severity. Identify the location of remotely and non-remotely operable MLV's within the project. Engineer and implement additional mitigation methods as necessary based on these results.

- **Observation 4**


- Inspection and other 49 CFR 192 requirements vary depending on the percentage of the Specified Minimum Yield Strength (SMYS) of the pipe. Review of inspection and other change-of-service requirements cited in Section 4.6.4 cannot be completed without this information.

- **Proposed Mitigation / Clarification 4**

- G-4
- Provide percentage of SMYS for each pipeline segment.

Thank you for the opportunity to provide these comments and I look forward to receiving a report which addresses these concerns.

Sincerely,


Brian Sponsler

3.7. Sponsler (continued)

G-3 See responses to G-1 and G-2; additional automatic shutdown valves were added to enhance public safety. Analysis of event severity is provided on pages 4-178 to 4-179. Mitigation measure MM HAZ-1c was included to reduce the incidence of the most common cause of pipeline rupture third-party damage. These added measures exceed the requirements of DOT gas pipeline standards. The response time evaluation suggested in the comment does not increase the severity of events analyzed in the DEIR/EA or address the most common cause of ruptures. The DOT pipeline standards are published in Parts 190-199 of Title 49 of the CFR. Part 192 of Title 49 CFR specifically addresses natural gas pipeline safety issues that are designed to protect public safety. The pipeline and associated aboveground facilities associated with the El Paso Line 1903 Pipeline Conversion Project Alternative would be designed, constructed, operated, and maintained in accordance with, or to exceed, the DOT Minimum Federal Safety Standards in Title 49 CFR Part 192. These regulations, which are intended to protect the public, ensure adequate response times, and prevent natural gas facility accidents and failures, include specifications for material selection and qualification; minimum design requirements; and protection of the pipeline from internal, external, and atmospheric corrosion.

G-4 CSLC engineering staff have reviewed the SMYS of the pipe and their findings have been summarized and incorporated into Section 4.6 of the DEIR/EA. This information was used to ensure that the appropriate portions of the DOT regulations are applied.

Comments